

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

In re:

LAMBUTH UNIVERSITY,
Debtor.

Case No. 11-11942-GHB
Chapter 11

**MOTION TO SHORTEN TIME FIXED FOR NOTICE AND HEARING ON DEBTOR'S
MOTION FOR AN ORDER AUTHORIZING DEBTOR TO ENTER INTO LEASE OF
PREMISES TO THE STATE OF TENNESSEE, BOARD OF REGENTS**

Comes now Lambuth University, by and through counsel, and hereby moves this Court for entry of an Order, pursuant to Sections 105(a) and 363 of Title 11 of the United States Code (the "Bankruptcy Code") and Rules 2002 and 9006 of the Federal Rules of Bankruptcy Procedure to shorten time fixed for notice and hearing on the Motion for an Order Authorizing Debtor to Enter into Lease of Premises to the State of Tennessee Board of Regents (the "Motion") and in support of its Motion would show unto the Court as follows:

1. The Debtor filed the Motion on July 29, 2011.
2. The Debtor would show that the property proposed to be leased in the Motion is the campus of Lambuth University. The Debtor seeks a shortened notice period because the University of Memphis must commence the Fall Semester and must have the Lease in place before doing so.
3. The Debtor would show good cause exists to reduce the 20-day notice period provided by Rule 2002 of the Federal Rules of Bankruptcy Procedure and to set the hearing on the Motion for hearing on or before August 4, 2011. Pursuant to Rule 2002(a)(2) and Rule 9006, the 20-day notice period for the notice of and hearing on the Motion may be shortened.

WHEREFORE, PREMISES CONSIDERED, Lambuth University seeks an order of this Court shortening the time fixed for notice and hearing on the above-described Motion and for other relief to which they may be entitled in the premises.

Respectfully Submitted,

/s/ Steven N. Douglass

Steven N. Douglass (TN Disc. No. 09770)

2700 One Commerce Square

Memphis, Tennessee 38103

Telephone: (901) 525-1455

Facsimile: (901) 526-4084

Email: sdouglass@harrisshelton.com

*Proposed Counsel for the Debtor and
Debtor-in-Possession*

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of July, 2011, I served copies of the foregoing electronically filed Motion and any Exhibit attached thereto either via U.S. mail or via electronic mail upon: the United States Trustee and the following parties:

All American, Inc.
3230 Summer Ave.
Memphis, TN 38112

BancorpSouth
P. O. Box 549
Jackson, TN 38302

City of Jackson
107 East Main St.
P. O. Box 2391
Jackson, TN 38302

Cline Tours
P. O. Box 300148
Memphis, TN 38118

Cross Gate Services, Inc.
1730 Gen Geo Patton Drive
Brentwood, TN 37027

FHEG Lambuth University Bookstore
Store No. 114
3146 Solutions Center
Chicago, IL 60677-3001

Health Partners, Inc.
1804 Hwy. 45 By-Pass
Suite 400
Jackson, TN 38305

Hobsons, Inc.
P. O. Box 641055
Cincinnati, OH 45264-1055

Jackson Downtown Lions Club
P O Box 3426
Jackson, TN 38303

Jackson Energy Authority
P. O. Box 2288
Jackson, TN 38302-2288

Johnseys Sporting Goods
447 N. Royal Street
Jackson, TN 38301-5370

Kesslers Team Sports
930 East Main Street
Richardson, IN 47374

Rainey, Kizer, Reviere, Bell PLC
105 S. Highland Ave.
Jackson, TN 38301

Skeeter Kell Sporting Goods
212 N. Main Street
Kennett, MO 63857

Three Rivers Systems, Inc.
P. O. Box 78609
St. Louis, MO 63178

Gerald F. Mace, Esq.
Robert P. Sweeter, Esq.
511 Union Street, Suite 2700
Nashville, TN 37219
gerald.mace@wallerlaw.com
robert.sweeter@wallerlaw.com

Radian Asset Assurance
c/o Stephen W. Ragland, Esq.
100 Peabody Place, Suite 900
Memphis, Tennessee 38103
sragland@bassberry.com

TN Dept. of Labor & Workforce
c/o TN Attorney General's Office/Bankr. Div.
P.O. Box 20207
Nashville, Tennessee 37202-0207

Johnson Controls, Inc.
P. O. Box 905240
Charlotte, NC 28290

Mac-Gray Corp.
404 Wyman Street, Suite 400
Internal Mail Slot #13
Waltham, MA 02451-1264

Riddell All American Sports
4230 Paysphere Circle
Chicago, IL 60674

Sodexo, Inc. & Affiliates
P. O. Box 536922
Atlanta, GA 30353-6922

Waste Management of Jackson - TN
P. O. Box 9001054
Louisville, KY 40290

GE Money Bank
c/o Recovery Management Systems Corp.
25 SE 2nd Avenue, Suite 1120
Miami, Florida 33131-1605
claims@recoverycorp.com

Radian Asset Assurance
c/o Peter L. Canzano, Esq.
1501 K Street, NW
Washington, DC 20005

Department of Finance of Administration
Office of Real Property
William R. Snodgrass Tennessee Tower
22nd Floor - 312 Rosa L. Parks Avenue
Nashville, TN 37243-1102

/s/ Steven N. Douglass
Steven N. Douglass